

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

KADARIUS BUSH,

Plaintiff,

vs.

No. 2:22-cv-2262

**ALEXANDER RODRIGUEZ and
AJ TRANSPORTATION, LLC,**

Defendants.

NOTICE OF REMOVAL OF CIVIL ACTION

TO: Louis P. Chiozza
230 Adams Avenue
Memphis, TN 38103
lou@chiozzalaw.com

The removing Defendants, Alexander Rodriguez (Camejo) and AJ Transportation, LLC, pursuant to 28 U.S.C. §1332(a)(2), 1441 and 1446, and by and through counsel of record, Carl Wyatt and Glassman, Wyatt, Tuttle & Cox, P.C., hereby file their Notice that this matter has been removed from the Circuit Court of Shelby County, Tennessee, to the United States District Court for the Western District of Tennessee, Western Division, and as basis for said removal would show as follows:

1. This matter was originally filed in the Circuit Court of Shelby County, Tennessee, on the 16th day of August, 2021, under Docket No. CT-3301-21. A copy of the original Complaint filed in the Circuit Court of Shelby County, Tennessee, is attached to this Notice of Removal as Exhibit "A".

2. Plaintiff, Kadarius Bush, is currently, and was at the time the Complaint was filed, a resident citizen of Memphis, Shelby County, Tennessee.

3. The Defendant, Alexander Rodriquez (Camejo), is presently, and was at the time the Complaint was filed, a resident citizen of Phoenix, Arizona.

4. The Defendant, AJ Transportation, LLC, is currently, and was at the time the Complaint was filed, a Limited Liability Company with its principal place of business being in Phoenix, Arizona, and said LLC is organized and registered under the laws of the State of Arizona. Further, the sole member of the LLC is Alexander Rodriquez (Camejo), who is a resident citizen of Phoenix, Arizona.

5. On or about April 12, 2022, the Defendants were served with the Summons and Complaint (Alias Summons) out of the Circuit Court of Shelby County, Tennessee.

6. This action is a civil action for alleged personal injuries as a result of a motor-vehicle accident which occurred in Memphis, Shelby County, Tennessee on or about August 19, 2020.

7. Removal of this action is timely filed. See 28 U.S.C. §1446(b).

8. The Complaint sets forth an *ad damnum* of “\$550,000” for compensatory damages. As such, Defendant contends that the amount in controversy, exclusive of interest and costs, exceeds the sum of \$75,000.00.

9. This Court has original jurisdiction of this action pursuant to 28 U.S.C. §1332(a)(2) and (c) as the lawsuit is between a resident citizen of Shelby County, Tennessee, and a resident citizen of the State of Arizona as well as a Limited Liability Company organized under the laws of the State of Arizona with its sole member being an Arizona resident citizen.

10. Removing Defendant would further show that venue properly lies with this Court and in this Division pursuant to 28 U.S.C. §1441(a) as this case is being removed from the Circuit Court of Shelby County, Tennessee.

11. As required by 28 U.S.C. § 1446(d), written notice of the filing of this Notice will be given to all parties and a true and correct copy of this Notice will be filed with the Clerk of Shelby County, Tennessee, thereby effectuating removal of this action to this Court.

Respectfully submitted,

s/ Carl Wyatt
CARL WYATT, #12304
Glassman, Wyatt, Tuttle & Cox P.C.
26 North Second Street
Memphis, TN 38103
P: (901) 527-2143
F: (901) 527-5320
cwyatt@gwtclaw.com
Counsel for Defendants
GWTC File No. 20-263Z

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of April, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system.

A true and correct copy of the foregoing pleading has been properly served via the Court's CM/ECF system, Email and/or United States Mail, postage prepaid upon the following:

Louis P. Chiozza
230 Adams Avenue
Memphis, TN 38103
lou@chiozzalaw.com

s/ Carl Wyatt
Carl Wyatt